

UNITED STATES DISTRICT COURT
DISTRICT OF VERMONT

UNITED STATES OF AMERICA,)	
)	
v.)	Crim. No. 5:16-CR-94
)	
BRIAN FOLKS aka "Moe," aka "Moet Hart,")	
Defendant.)	

PROPOSED LANGUAGE FOR ORDER RE: BACKPAGE

The United States of America, by and through its attorney, Christina E. Nolan, United States Attorney, files this proposed language for the Order contemplated by the Court at the Status Conference of May 4, 2018, regarding the search of the seized Backpage servers, due today, June 1, 2018.

If the Court does intend to issue the contemplated Order, the Government suggests that the Court simply order the production of: *any and all advertisements, from June 1, 2012 to March 31, 2016, with associated payment/IP address information, from the "Burlington Escorts" section of Backpage.com.*

In the event that the Court would prefer to take a more tailored approach, the Government requests that the order include the following language: *any and all advertisements, from June 1, 2012 to March 31, 2016, with associated payment/IP address information, from the "Burlington Escorts" section of Backpage.com, including, originating from, or associated with the following email addresses or telephone numbers:*

Jimmyporter380@gmail.com
mobeasthart@gmail.com
silencethemall@ymail.com
latulippemandy69@gmail.com
heartlessjess123@gmail.com
liraem12412@gmail.com
Kellishea02@sprintpcs.com

Bordeaux.bradleyxx@gmail.com
Dev81870@yahoo.com

Phone
306-268-1734
315-296-2012
347-241-7075
347-733-2605
347-913-8789
347-991-4391
510-340-5126
518-930-5490
603-268-1734
646-240-9746
646-455-1139
646-491-3214
646-529-0386
718-930-8564
781-222-8377
802-242-1791
802-274-2688
802-309-7601
802-310-1101
802-310-1913
802-310-3567
802-310-6410
802-310-8497
802-310-8797
802-318-7052
802-318-7930
802-324-4718
802-324-4741
802-324-7412
802-338-7422
802-355-3197
802-355-4671
802-356-2646
802-363-8717
802-363-9653
802-373-5875
802-373-8106
802-399-7193
802-497-4161
802-503-6047

802-522-8871
802-557-2463
802-585-5387
802-585-5923
802-658-1398
802-683-8870
802-752-5475
802-752-8475
802-777-0312
802-777-1549
802-777-2705
802-777-4806
802-777-8913
802-777-8985
802-798-2516
802-825-1404
802-825-3316
802-825-4245
802-825-4614
802-825-4647
802-825-4673
802-825-4717
802-825-4945
802-825-7440
802-825-9174
802-825-9292
802-825-9764
914-258-7657
914-893-0507
914-979-0330
917-275-1574
917-279-4085
917-309-0772
929-229-9420
973-826-4360

Respectfully submitted, this 1st day of June, 2018.

CHRISTINA E. NOLAN
United States Attorney

By: /s/ Abigail E. Averbach
Abigail E. Averbach
Assistant U.S. Attorney

P.O. Box 570
Burlington, VT 05402-0570
(802) 951-6725
abigail.e.averbach@usdoj.gov

JOHN M. GORE
Acting Assistant Attorney General
Civil Rights Division

By: /s/ Jared Fishman
JARED FISHMAN
Special Litigation Counsel
EMILY SAVNER
Trial Attorney
Civil Rights Division, Criminal
Section
U.S. Department of Justice
601 D Street, NW, 5th Floor
Washington, DC 20530
Telephone: (202) 598-1877
Jared.Fishman2@usdoj.gov

Certificate of Service

By filing the above document this day via the Court's electronic filing system, I certify that a copy will be served on Mark Kaplan and Natasha Sen, Counsels for Defendant, via ECF.

Dated: June 1, 2018
Burlington, Vermont

By: /s/ Abigail E. Averbach
Abigail E. Averbach
Assistant U.S. Attorney
P.O. Box 570
Burlington, VT 05402-0570
(802) 951-6725
abigail.e.averbach@usdoj.gov